

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

TERRY DANIEL,)	
)	
Plaintiffs,)	
)	CIVIL ACTION NUMBER:
v.)	
)	3:05cv01110-WKW
CITY OF LANETT, ALABAMA,)	
)	
Defendants.)	

PLAINTIFF'S EXHIBIT LIST

Pursuant to Rule 26(a)(3), Federal Rules of Civil Procedure, the plaintiff hereby submits the following documents may be used at trial:

1. EEOC investigative file for charge 130-2005-03666
2. Job listing for Fire/EMS Chief listed in The Valley Times News on 11/2/05;
3. Job Listing for Fire/EMS Chief listed in The Valley Times News on 10/31/05;
4. Job Listing for Fire/EMS Chief listed in the Opelike-Auburn News on 10/30/05;
5. Letter from Jennie J. Gunnells to Various Newspapers & media dated 10/27/05 regarding the available position for Fire/EMS Chief;
6. Job listing for Fire/EMS Chief, City of Lanett from the Alabama League of Municipalities;
7. Memo from Chief Anthony Johnson to All Personnel dated 12/15/04;

8. Article from The Valley Times News entitled Demotion Challenged by Former Police Chief dated 2/3/05
9. Article from The Valley Times News entitled Council Names Tim Jennings Interim Fire Chief in Lanett dated 6/21/05;
10. Article from The Valley Times News entitled Lanett Affirms Demotion of Former Chief dated 2/8/05;
11. Job posting and description for Fire Chief dated 10/20/05;
12. Career/Promotion Advancement Opportunity for Administrative Secretary with hand written notes by plaintiff;
13. Statement of Billy J. Daniel;
14. Memo from Chief to All Employees regarding City Hall dated 3/9/06;
15. City Council Agenda for Monday 4/13/06;
16. Retirement Estimate Reports for Plaintiff;
17. Top Out Pay Scale;
18. Plaintiff's license from Alabama State Board of Health for Basic/Driver;
19. FEMA Certificate of Achievement for Plaintiff;
20. Plaintiff's 1988 Alabama ENT license Examination;
21. Plaintiff's Tax Returns for 2000-2004;l
22. City of Lanett Pay Plan;
23. Plaintiff's GED Materials;

24. Plaintiff's materials from the Alabama National Guard Armory;
25. 1986 and 1989 Position Description for Fire Chief;
26. 1994 Materials Regarding Apparatus Operator;
27. Position Description for Captain posting 1988;
28. Position Description for Personnel Clerk posted April 1986;
29. Position Description of City Manager posted April 1986;
30. Position Description of Fire Fighter posted April 1986;
31. Position Description of Lieutenant posted April 1989;
32. Position Description of Fire Captain posted April 1986;
33. Position Description of Captain posted February 1992;
34. List of Employees and achievements;
35. Employees' Retirement System of Alabama Retirement Facts November 1989;
36. Organization Chart 2005;
37. Application for Employment for Plaintiff;
38. Standard Operating Procedure;
39. Letter from Donald Nelson to Plaintiff dated 6/19/1998;
40. Employee Personnel Handbook, August 1, 2004 and January 1, 1987 revised April 1992;

41. List of Grad Listings;
42. City of Lanett Police Prohibiting Discrimination and Sexual Harassment;
43. Documents regarding Career Advancement for position of Captain;
44. Documents relating to EEOC Charge 130-99-0900;
45. Career Advancement for position of Captain in 11/1998;
46. Career Advancement for position of Captain in 09/1997;
47. Documents relating to EEOC Charge 130-96-2877;
48. Career Advancement for position of Captain in 04/1996;
49. Order Approving Settlement and Petition of Case NO CV-94-257 in Circuit Court of Chambers County regarding workmans' compensation claim;
50. Documents relating to plaintiff's on the job injury in 10/1992;
51. Documents regarding the Captain's position/promotion of 1992;
52. Career Advancement for position of Major in 04/1992;
53. List of Fire Department Employees phone numbers;
54. Documents relating to filing a grievance April 2003 - July 2003;
55. Career Advancement for position of City Clerk in 04/1986;
56. Plaintiff's Vocational Assessment from Dr. M. Katryn Ness 1/14/96;

57. Documents relating to a fire report on 44th Avenue SW in January 2005;
58. Plaintiff's Employee Performance Review 2/1/05;
59. Plaintiff's resume, Certificates awarded to Plaintiff and training courses plaintiff attended.
60. City of Lanett Council Meeting Minutes - 11/7/05, 3/6/06, and 2/22/06;
61. Terry Daniel's Personnel File;
62. Affidavit of Chief Anthony Johnson;
63. Affidavit of Mayor Oscar Crawley;
64. Amended Affidavit of Mayor Crawley;
65. Employee Handbook of 8/1/04;
66. Documents related to Plaintiff's EEOC Complaint regarding a Farfield Cartoon;
67. Plaintiff's job evaluation of January/February 2005;
68. Affidavit of Kelley Meacham;
69. Affidavit of Joel Holley;
70. Memorandum from Chief Johnson to Mayor Crawley;
71. Standard Operating Procedure Document;
72. Documents regarding Plaintiff's grievance in 2000 regarding job change for one day;

73. Documents regarding Plaintiff's grievance in 2003 regarding job change for one day;
74. Backpay Chart attached to the Plaintiff's Damages List;
75. Damages Statement attached the Plaintiff's Damages List;
76. Deposition transcripts of all depositions taken in this action;
77. Any document necessary for rebuttal;
78. All documents listed on the defendants' exhibit list;
79. All documents produced or identified by defendants in response to the plaintiff's request for production of documents and/or defendant's initial disclosures;
80. All documents produced in the plaintiff's deposition.

/s/ Heather N. Leonard
Heather N. Leonard
ATTORNEY FOR PLAINTIFF

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

T. Randall Lyons
WEBSTER, HENRY & LYONS, P.C.
P.O. Box 239
Montgomery, AL 36101

/s/ Heather Leonard
Of Counsel